

Bobby Nordan
Metro Checking, Inc.

1. What requirements have banking institutions imposed on money services businesses to open or maintain account relationships since the issuance of the joint guidance by FinCEN and the Federal Banking Agencies in April 2005?

RESPONSE: AM South stopped me from doing business in ^{October} ~~August~~ ~~or Sept~~ of 2004 - Prior to that I was dropped by South Trust Bank. Both of these banks are in Chatanooga, TN. I understood from both banks that they discontinued doing bus with all check cashers. I always kept 70,000 to 100,000 or more in cash in these banks because we have ~~cash~~ checks up to \$20,000.

2. Describe any circumstances under which money services businesses have provided or have been willing to provide the information specified in the guidance issued by FinCEN to money services businesses in April 2005, concerning their obligations under the Bank Secrecy Act, and yet have had banking institutions decline to open or continue account relationships for the money services businesses.

RESPONSE: As mentioned above my problems started before April of 2005.

3. Have Bank Secrecy Act-related grounds been cited for why banking institutions have decided not to open, or have decided not to continue to maintain, account relationships for money services businesses since the issuance of the guidance to money services businesses and to banking institutions in April 2005?

RESPONSE: I have never understood the reason for closing my account - I explained at the time that I believed it left them open for litigation. Please refer to the enclosed letter from AM South Bank.

4. Would additional guidance (including, if applicable, clarification of existing guidance) to the banking industry regarding the opening and maintenance of accounts for money services businesses within the Bank Secrecy Act regulatory framework be beneficial? If so, what specifically should such guidance address?

RESPONSE:
Not familiar enough to respond.
Same applies to 5, 6, 7.

6-28-06
Bobby Nordan